UNITED STATES DISTRICT COURT

| SOUTHERN DISTRICT OF NEW YORK | | |
|--|----------|-----------------------------|
| | - x : | |
| In re: | : | |
| CELSIUS NETWORK LLC, et al.,1 | : | |
| Reorganized Debtors. | : | |
| | - X | |
| CELSIUS NETWORK LLC and affiliated | : | |
| post-Effective Date Debtors, by and through | : | Civil No. 1:25-cv-02669-MMG |
| the Blockchain Recovery Investment Consortium, | : | |
| LLC, acting in its capacity as the Complex Asset | : | |
| Recovery Manager and Litigation Administrator, | : | |
| Plaintiff, | : | |
| | : | |
| - against - | : | |
| CHADIAL VOIC DIC | : | |
| CHAINALYSIS INC., | : | |
| Defendant. | : | |
| | : | |
| | - X | |

NOTICE OF DEFENDANT CHAINALYSIS INC.'S MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated May 9, 2025, and the Declaration of Alexander C. Drylewski, dated May 9, 2025, and the exhibits thereto, Defendant Chainalysis Inc. ("Chainalysis") will move this Court, before the Honorable Margaret M. Garnett, at the United States Courthouse, Courtroom 906, 40 Foley Square, New York, New York, on a date and time to be determined by the Court, for an Order dismissing

-

¹ The Debtors in these Chapter 11 cases ("Celsius Debtors"), along with the last four digits of their federal tax identification numbers, are: Celsius Network LLC (2148) ("Celsius"); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450).

with prejudice Plaintiff's Complaint against Chainalysis and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York May 9, 2025

Respectfully submitted,

/s/ Alexander C. Drylewski
Robert D. Drain
Alexander C. Drylewski
Lara A. Flath
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3000
Facsimile: (212) 735-2000
robert.drain@skadden.com
alexander.drylewski@skadden.com
lara.flath@skadden.com

Counsel for Defendant Chainalysis Inc.